

EXHIBIT B

LAW OFFICES
WILLIAMS & CONNOLLY LLP

725 TWELFTH STREET, N.W.

WASHINGTON, D. C. 20005-5901

(202) 434-5000

FAX (202) 434-5029

LANCE A. WADE
(202) 434-5755
lwade@wc.com

EDWARD BENNETT WILLIAMS (1920-1988)
PAUL R. CONNOLLY (1922-1978)

February 14, 2019

Via Email

Mr. John C. Bostic, Esquire
Mr. Jeffrey Schenk, Esquire
Mr. Robert Leach, Esquire
Assistant United States Attorneys
United States Attorney's Office
Northern District of California
150 Almaden Blvd. Suite 900
San Jose, CA 95113

Re: United States v. Elizabeth Holmes and Ramesh "Sunny" Balwani, No. CR-18-00258-EJD (N.D. Cal.)

Dear Counsel:

As you know, our client, Elizabeth Holmes, had prior attorney-client relationships with certain witnesses whom the government interviewed in this matter, including David Boies and Daniel Mosley ("Holmes Counsel"). We are concerned that in providing information to the government, these witnesses may have violated their legal and/or ethical obligations to Ms. Holmes. To permit us to properly assess this matter and consider what, if any, redress may be warranted, we ask that you provide us with the following documents and information:

1. Copies of any subpoenas directed to Holmes Counsel, their law firms, or any corporations with which they are affiliated;
2. Copies of all rough or draft notes of the interviews that were conducted of Holmes Counsel;
3. Copies of all communications you or other members of your prosecutorial team have had with Holmes Counsel, or attorneys representing them; and

WILLIAMS & CONNOLLY LLP

John Bostic, Jeffrey Schenk, and Robert Leach

February 14, 2019

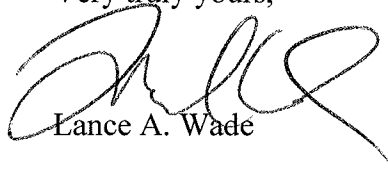
Page 2

4. Summaries of all oral communications (including proffers) you or other members of your prosecutorial team have had with Holmes Counsel, or attorneys representing them, that are not otherwise memorialized in Federal Bureau of Investigation 302s or other agency reports of investigation.

While we assess the degree to which Ms. Holmes' rights may have be infringed upon, we ask that the government refrain from substantively reviewing the materials requested above and the 302s and reports of investigation for Holmes Counsel that have been produced to date.

We appreciate your prompt consideration of this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lance A. Wade", with a stylized, cursive flourish extending from the end.

Lance A. Wade